

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

No. 24-mc-00353 (LJL)

RUDOLPH W. GIULIANI,

Defendant.

**[PROPOSED] ORDER TO SHOW CAUSE WHY DEFENDANT RUDOLPH W.  
GIULIANI SHOULD NOT BE HELD IN CONTEMPT  
FOR FAILING TO COMPLY WITH THE TURNOVER ORDERS**

Upon consideration of the Plaintiffs' Motion for an order to show cause why Defendant Rudolph W. Giuliani should not be held in contempt for failing to comply with this Court's October 22, 2024 Order (ECF No. 62), November 8, 2024 Order (ECF No. 94), and the November 22, 2024 Order (ECF No. 148) obligating the Defendant to turn over certain property to the Plaintiffs-Recipients ("Motion"), the memorandum of law in support of the Motion, the declaration of Amelia Diaz, and the declaration of Aaron E. Nathan and the supporting documents attached thereto, it is hereby:

**ORDERED** that the Motion is **GRANTED**; and it is

**THEREFORE ORDERED**, pursuant to this Court's inherent contempt authority, that Defendant shall appear before this court on the \_\_\_\_ day of \_\_\_\_\_, 2024, at \_\_\_\_\_.m. at the Daniel Patrick Moynihan Courthouse for the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 15C, New York, NY 10007, to show cause, if any there be, why this Court should not find him in civil contempt for failing to comply with the Turnover Orders, and impose such relief as it deems appropriate.

**IT IS FURTHER ORDERED** that any opposition to this Order to Show Cause shall be filed within    days of this order.

SO ORDERED.

Dated: December   , 2024  
New York, New York

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Hon. Lewis J. Liman  
United States District Judge